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10 **UNITED STATES DISTRICT COURT**  
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

12 **GGCC, LLC**, an Illinois Limited  
13 Liability Company, Individually and on  
Behalf of All Others Similarly Situated,

14 Plaintiffs,

15 v.

16 **DYNAMIC LEDGER SOLUTIONS,**  
17 **INC.**, a Delaware Corporation, **TEZOS**  
18 **STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, and **ARTHUR BREITMAN**,  
an Individual,

19 Defendants.  
20

Case No: 5:17-cv-06779-RS

**[PROPOSED]**

**ORDER CONSOLIDATING CASES**

21 **ANDREW OKUSKO**, individually and  
on behalf of all others similarly situated,

22 Plaintiff,

23 v.

24 **DYNAMIC LEDGER SOLUTIONS,**  
25 **INC., THE TEZOS FOUNDATION,**  
**KATHLEEN BREITMAN, ARTHUR**  
26 **BREITMAN, and TIMOTHY**  
**DRAPER,**

27 Defendants.  
28

Case No: 3:17-cv-06829-RS

**ANDREW BAKER**, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC.**, a Delaware corporation, **TEZOS  
STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, **ARTHUR BREITMAN**, an  
Individual, **JOHANN GEVERS**, an  
individual, **STRANGE BREW  
STRATEGIES, LLC**, a California  
limited liability company, and **DOES 1  
through 100 inclusive**,

Defendant.

Case No. 3:17-cv-06850-RS

**BRUCE MACDONALD**, Individually  
and on Behalf of All Others Similarly  
Situated,

Plaintiff,

v.

**DYNAMIC LEDGER SOLUTIONS,  
INC.**, a Delaware corporation, **TEZOS  
STIFTUNG**, a Swiss Foundation,  
**KATHLEEN BREITMAN**, an  
Individual, **ARTHUR BREITMAN**, an  
Individual, **TIMOTHY COOK  
DRAPER**, an individual, **DRAPER  
ASSOCIATES**, **JOHANN GEVERS**,  
**DIEGO PONZ**, **GUIDO  
SCHMITZKRUMMACHER**,  
**BITCOIN SUISSE AG**, **NIKLAS  
NIKOLAJSSEN**, and **DOES 1-100,  
INCLUSIVE**,

Defendants.

Case No. 3:17-cv-07095-JSC

Pursuant to Fed. R. Civ. P. 16(d), and Manual for Complex Litigation, Fourth §§ 11.12 and 31 (2004), the Court hereby orders as follows:

### CONSOLIDATION OF RELATED CASES

1. Plaintiff GGCC, LLC's Motion to Consolidate Cases is hereby **GRANTED**.

2. The following actions are related cases within the meaning of Civ. L.R. 3-12:

*GGCC, LLC v. Dynamic Ledger Solutions, Inc., et al.*, No. 5:17-cv-06779-RS  
*Okusko v. Dynamic Ledger Solutions, Inc., et al.*, No. 3:17-cv-06829-RS,  
*Baker v. Dynamic Ledger Solutions, Inc., et al.*, No. 3:17-cv-06850-RS, and  
*MacDonald v. Dynamic Ledger Solutions, Inc., et al.*, No. 3:17-cv-07095-JSC  
 and these cases are hereby consolidated into Civil Action No. 5:17-cv-06779-RS for pretrial proceedings before this Court. The consolidated action shall be captioned: "In re Tezos ICO Securities Litigation."

3. All related actions that are subsequently filed in, or transferred to, this District shall be consolidated into this action for pretrial purposes. This Order shall apply to each such related action, absent order of the Court. A party that objects to such consolidation, or to any other provision of this Order, must file an application for relief from this Order within thirty (30) days after the date on which a copy of the order is mailed to the party's counsel pursuant to Paragraph 8, *infra*.

4. This Order is entered without prejudice to the rights of any party to apply for severance of any claim or action, for good cause shown.

### MASTER DOCKET AND CAPTION

5. The docket in Civil Action No. 5:17-cv-06779-RS shall constitute the Master Docket for this action.

6. Every pleading filed in the consolidated action shall bear the following caption

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**IN RE TEZOS ICO SECURITIES  
LITIGATION**

Master File No: 5:17-cv-06779-RS

CLASS ACTION

**This Document Relates To:**

**[Document Title]**

7. The file in Civil Action No. 5:17-cv-06779-RS shall constitute a Master File for every action in the consolidated action. When the document being filed pertains to all actions, the phrase “All Actions” shall appear immediately after the phrase “This Documents Relates To:”. When a pleading applies only to some, not all, of the actions, the document shall list, immediately after the phrase “This Documents Relates To:”, the docket number for each individual action to which the document applies, along with the last name of the first-listed plaintiff in said action.

8. The parties shall file a Notice of Related Cases pursuant to Civil L.R. 3-12 whenever a case that should be consolidated into this action is filed in, or transferred to, this District. If the Court determines that the case is related, the clerk shall:

- (a) place a copy of this Order in the separate file for such action;
- (b) serve on plaintiff's counsel in the new case a copy of this Order;
- (c) direct that this Order be served upon defendants in the new case; and
- (d) make the appropriate entry in the Master Docket.

By: \_\_\_\_\_

Richard Seeborg,

United States District Judge